

1 TRACY L. WILKISON
Acting United States Attorney
2 CHRISTOPHER D. GRIGG
Assistant United States Attorney
3 Chief, National Security Division
JUDITH A. HEINZ (Cal. Bar No. 176264)
4 Assistant United States Attorney
Senior Litigation Counsel, National Security Division
5 JAMES C. HUGHES (Cal. Bar No. 263878)
Assistant United States Attorney
6 Major Crimes Section, Criminal Division
MELANIE SARTORIS (Cal. Bar No. 217560)
7 Assistant United States Attorney
Deputy Chief, General Crimes Section, Criminal Division
8 WILLIAM M. ROLLINS (Cal. Bar No. 287007)
Assistant United States Attorneys
9 Terrorism and Export Crimes Section
KHALDOUN SHOBAKI (Cal. Bar No. 232864)
10 Assistant United States Attorney
Cyber & Intellectual Property Crimes Section
11 1500 United States Courthouse
312 North Spring Street
12 Los Angeles, California 90012
Telephone: (213) 894-7280/5615/7407/0759
13 Facsimile: (213) 894-2927
E-mail: judith.heinz@usdoj.gov
14 james.hughes2@usdoj.gov
melanie.sartoris@usdoj.gov
15 william.rollins@usdoj.gov
khaledoun.shobaki@usdoj.gov
16

Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 YI-CHI SHIH,
aka "Yichi Shih,"
24 aka "Yuqi Shi," et al,

25 Defendants.
26
27
28

No. CR 18-50 (B) -JAK

JOINT STATEMENT REGARDING WITNESS
LIST FOR EVIDENTIARY HEARING ON
LOSS AMOUNT

JOINT STATEMENT

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California, and Assistant United States Attorneys Judith A. Heinz, James C. Hughes, William M. Rollins, Melanie Sartoris, and Khaldoun Shobaki; and Defendant Yi-Chi Shih, by and through his counsel of record, James W. Spertus, Christa Culver Wasserman, and M. Anthony Brown, hereby file this Joint Statement Regarding the Witness List for the Evidentiary Hearing on Loss Amount, scheduled for June 17, 2021:

1. The parties understand that each side shall have a total of 90 minutes combined (i.e. 90 minutes for the government and 90 minutes for the defense) for any direct, cross examination, and re-direct of all witnesses, including rebuttal witnesses, who testify during the June 17, 2021 hearing.

2. The Defense objects to the 90-minute limitation and believes 90 minutes will be insufficient for adequate defense cross-examination of government witnesses and the presentation of its rebuttal evidence.

3. The government expects to call Dr. Christopher Nordquist and Dr. David Sandison. The defense expects to call Dr. Ion Opris. All three witnesses will testify in person.

4. The parties jointly request that the Court adopt the following procedure and order of testimony during the hearing:

a. The government shall be permitted to conduct a direct examination of Dr. Nordquist and/or Dr. Sandison.

b. The defense shall be permitted to conduct a cross examination of Dr. Nordquist and/or Dr. Sandison.

- 1 c. The government shall be permitted to conduct a redirect
2 examination of Dr. Nordquist and/or Dr. Sandison.
3 d. After the government's expert(s) testify, the defense shall
4 conduct a direct examination of Dr. Opris.
5 e. The government shall be permitted to conduct a cross
6 examination of Dr. Opris.
7 f. The defense shall be permitted to conduct a redirect
8 examination of Dr. Opris.
9 g. The government shall be permitted to call Dr. Nordquist
10 and/or Dr. Sandison in rebuttal if the government has time
11 remaining from its 90 minutes, subject to the same direct,
12 cross, and redirect procedures set forth above.

13 Dated: June 14, 2021

Respectfully submitted,

14 TRACY L. WILKISON
15 Acting United States Attorney

16 CHRISTOPHER D. GRIGG
17 Assistant United States Attorney
Chief, National Security Division

18 /s/
JUDITH A. HEINZ
19 JAMES C. HUGHES
MELANIE SARTORIS
20 WILLIAM M. ROLLINS
KHALDOUN SHOBAKI

21 /s/ via email authorization
22 JAMES W. SPERTUS
23 CHRISTA CULVER WASSERMAN
24 M. ANTHONY BROWN
Spertus Landes & Umhofer LLP
25 Counsel for Defendant Yi-Chi Shih
26
27
28